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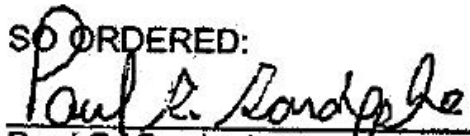
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MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

March 23, 2021

Dated: March 24, 2021

VIA ECF

The Honorable Paul G. Gardephe
United States District Judge for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: United States v. Kaleil Isaza Tuzman, S8 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We respectfully submit this letter on behalf of Kaleil D. Isaza Tuzman. First, he would like to convey his gratitude to the Court for permitting him to visit with family in Massachusetts during the Hanukkah holiday in December 2020. Second, he would like to request the opportunity to travel outside the Southern District of New York to spend the upcoming Passover holiday with family.

Specifically, Mr. Isaza Tuzman respectfully requests the Court's permission to travel for the beginning of Passover to the District of Massachusetts and the District of New Hampshire, from as soon as the Court may allow, until March 28, and then to travel to the District of Colorado or the District of Pennsylvania, from March 28 to April 8 for the end of Passover. This request is being made in less than the one week's notice as required by the Court due to COVID concerns that have resulted in planning issues and changes in the locations and attendance of Mr. Isaza Tuzman's family Passover observances.

If this request is granted, Mr. Isaza Tuzman would stay with his sister Intiya Isaza-Figueroa (85 Elm Street, Charlestown, MA) and his lifelong friend Thomas Herman (11 Echo Landing Road, Moultonborough, NH) during the first leg of travel, and then near his cousin Ofer Tal (2230 Spruce Street, Denver, CO) or with his uncle Martin Tuzman (707 Rambler Road, Elkins Park, PA) during the second leg of travel.

If this leave request is granted, all other terms and conditions of home detention would remain in place, and Mr. Isaza Tuzman would remain at all times under the supervision of Pretrial Services.

This request has been communicated to Pretrial Services, which responded as follows: "As per our office policy, our office objects to out-of-district multi-day travel requests. This

GIBSON DUNN

March 23, 2021

Page 2

objection is general and not specific to Mr. Isaza Tuzman, who has remained compliant with supervision and has traveled without incident many times in the past. If this leave request approved, we will enter it into the schedule.”

Mr. Isaza Tuzman has previously traveled to Colorado, Louisiana, Massachusetts and Pennsylvania for religious holiday observance and other events, with the Court’s permission. *See, e.g.*, ECF Nos. 125, 441, 758, 930, 952, 1033, 1089, 1104, 1110. In these cases and every other time Mr. Isaza Tuzman has travelled outside this District as permitted by the Court, he has left and returned without incident.

The government objects to this leave request, as it has to all prior out-of-district requests.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Avi Weitzman

Avi Weitzman

cc. All Counsel of Record (via ECF)
Officer John Moscato, U.S. Pretrial Services (via E-mail)